



Common Origination and Disbursement

Frequently Asked Questions

Overview

This Frequently Asked Questions (FAQ) document is an introduction to the Common Origination and Disbursement (COD) process. It updates the COD FAQs posted to the IFAP Web site on March 2, 2005.

Schools, third party servicers, and software providers can find detailed processing requirements and business rules in the 2003-2004, 2004-2005, and 2005-2006 COD Technical References at: <https://www.fsdownload.ed.gov/docsStudentAidGateway.htm/>.

The COD Technical Reference contains key information to assist with the development and implementation of financial aid systems/software that will interface with the COD System. For 2003-2004 and 2004-2005, this reference is for both COD Full Participants and Phase-In Participants and contains separate Pell and Direct Loan volumes specifically for Phase-In Participants. Starting with 2005-2006, the COD Technical Reference is for Full Participants only since *all* schools must process as Full Participants with the COD System beginning with the 2005-2006 Award Year.

The FAQs are organized into the following sections:

- Common Origination & Disbursement Basics
- Customer Service
- The COD Web Site
- Sending/Receiving Data in the COD Environment
- Promissory Notes
- Frequent COD Data Edits
- Reconciliation Tools for Schools

Common Origination & Disbursement Basics

What is Common Origination and Disbursement (COD)?

Common Origination and Disbursement (COD) is a streamlined method for processing, storing, and reconciling Pell Grant and Direct Loan financial aid data. The COD System was implemented in and has been processing records since April 2002 for Pell Grant and Direct Loan records. The COD System integrated the origination and disbursement processes for Pell Grants and Direct Loans that were previously performed by the Recipient Financial Management System (RFMS) and the Direct Loan Origination System (DLOS).



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What kind of COD training is available to schools?

Schools have the opportunity to participate in a variety of training about COD including:

- Computer based training (CBT) available on the IFAP Web site at:
<http://www.ifap.ed.gov/eannouncements/0408CODUpdateCBTWebsiteMarch04.html>.
- FSA's annual Electronic Access Conferences (EACs) in November and December 2005. The latest COD information and training will be presented at these conferences including updates for the 2005-2006 Award Year. For current information on registration, sessions and agenda, visit www.ifap.ed.gov and click on FSA conferences in the left-hand column.
- Schools may also access the Department of Education's Schools Portal Web site, <http://fsa4schools.ed.gov/SCHOOLSWebApp/index.jsp>, for additional information on upcoming COD events and training opportunities.

Did COD change the way schools receive funding for Pell Grant and Direct Loans?

Schools continue to receive funds the same way they did prior to COD implementation. For example: Pell Grant schools that participated in the Just-in-Time (JIT) program will continue in COD with the same JIT process. Advance pay schools continue to have the ability to draw down funds prior to submission of detailed student records. However, the COD System implemented a funds management enhancement that allows FSA to better manage Title IV funds. Schools may continue to submit disbursement records 30 days (for Pell) and 7 days (for Direct Loan) in advance of the disbursement date, but COD will not make additional funds available until seven days prior to the disbursement date on the student record.

What are some benefits of the COD process?

The COD System offers schools several benefits and flexibility in establishing processing parameters that meet individual school needs. The following are some benefits of the COD process:

- *Student-centric view:* All schools have an expanded ability to access student financial aid history online via a secure Internet accessible web site. Schools can view Pell Grant and Direct Loan data for a single student on one COD web screen.
- *Less data to report:* Full Participants enjoy the benefit of the XML Common Record that requires only the student identifier information necessary to match to the proper record and the data required to process the business requirement. Full Participants no longer have to submit an entire fixed length record in order to update a data element.
- *Choice of "edit-only" or "actual" disbursement options:* All schools are able to send "edit-only" records. Anticipated Disbursements sent as part of an "edit-only" record will not be posted to the student's award (grant or loan). This will not influence the amount of money available to the school, unless the disbursement release indicator (the disbursement release indicator is a field on the Common Record that designates a record as an Actual Disbursement Record) on that record is later changed to "true", or an actual disbursement record is received. Additional information regarding disbursement options is available in the 2003-2004, 2004-2005, and 2005-2006 COD Technical References at: <https://www.fsadownload.ed.gov/docsStudentAidGateway.htm>.



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- *Option to have COD initiate drawdowns on the school's behalf:* Direct Loan Schools that are eligible to participate in the pushed cash payment funding method may choose to have COD initiate drawdowns on their behalf, based upon accepted actual disbursement records.
- *Enhanced Cash Management Tools:* The COD System tracks and monitors schools' record reporting behavior and how quickly and accurately schools report records against their drawn cash. All financial aid offices and business offices can use the COD Web site functionality to chart their own progress using the same information available to FSA, schools, third party servicers, and COD customer service.
- *Easier to reconcile:* The COD System enables smooth and timely reconciliation by tracking and monitoring each school's drawdowns, reporting, and data corrections. This enables COD customer service and FSA to work with schools to avoid and resolve reconciliation problems.
- *COD customer service:* COD provides a single point of contact for customer service for Direct Loan and Pell Grant processing. Since Spring 2003, COD customer service provides support for "RFMS" years (1999-2000 through 2001-2002) as well as "COD" years. COD customer service will continue to provide support for Direct Loan "COD" years. COD customer service provides each school with primary customer support staff who monitor their schools' reporting, including record rejects, drawing funds, and progress toward reconciling. Customer service staff work directly with schools and third party servicers to resolve problems.
- *Streamlined process for requesting and reporting data:* Full Participants can use the flexibility of the Common Record to report a student's Pell Grant and Direct Loan award and disbursement data on a single XML record.
- *Access to information:* The COD Web site is like a "personal Customer Service Representative (CSR)", ready to assist schools 24/7. The COD Web site provides schools access to aggregate information across the Pell Grant and Direct Loan programs, providing a comprehensive view of the school's transaction and funding information. Schools are also able to select various processing options to best suit their needs.
- *Faster turnaround times:* COD provides faster turnaround time for data submitted to FSA for processing. COD processes web transactions in real time and batch transactions many times per day.

How often is the COD System changed?

The COD System is updated annually to implement new award years. Additionally, changes and/or updates to the COD System may occur during an award year as needed. The latest information on new and updated features to the COD System is posted on the IFAP Web site at <http://www.ifap.ed.gov/eannouncements/0310CODSystemImplementationfor0506AwardYear.html>. Additionally, changes and/or updates to the COD System may occur during an award year as needed.



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Do Federal Family Education Loan (FFEL) schools have to be Full Participants?

Full Participant status relates only to schools that participate in the Pell Grant and/or Direct Loan programs. FFEL program schools that participate in the Pell Grant Program must be Full Participants for the 2005-2006 Award Year. FFEL Program schools continue to send their loan records directly to their lenders, guaranty agencies, or servicers and do not send them to the COD System.

The Common Record was developed in partnership with members of the National Council of Higher Education Loan Programs (NCHELP) and the Postsecondary Electronic Standards Council (PESC). This collaborative effort enables the Common Record to bring consistency and standardization to the transmission of student financial aid data. The Common Record provides a structure to allow for the addition of FFEL data. Thus, the inherent processing efficiencies of the COD process will also be available to FFEL schools as the FFEL trading partners adopt the Common Record format.

I've seen FSA presentations that discussed COD using a new computer technology. What is the new technology?

FSA has incorporated into the COD process a variety of technologies that speed transaction processing and provide other enhancements to schools. The new technology is Extensible Markup Language (XML).

- *XML*: XML is the computer language COD uses for processing the Common Record and for web applications. XML uses data elements, like COBOL, BASIC, and other computer languages; however, XML is more flexible and efficient.

In COD, XML flexibility enables schools to send only the minimum amount of data elements required for a business action, rather than an entire fixed-length record. Using the XML-coded Common Record allows schools to submit multiple types of data for more than one student and award year without creating individual unique fixed-length records.

- *Middleware/Electronic Application Interface (EAI BUS)*: The EAI BUS acts as a bridge between schools, interfacing systems, and the COD System. The EAI BUS is also referred to as "Middleware". It transmits information from a school's SAIG mailbox to COD and vice versa

What resources can schools refer to for information on the Common Record layout?

Schools can refer to the XML Schema. In basic terms, an XML Schema describes how the Common Record is laid out, and is the definitive guide that specifies the rules surrounding the logical structure of an XML (Common Record) document. The XML Schema displays the



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appropriate elements and content associated with the Common Record, and the order in which they appear.

The XML Schema for the 2003-2004 Award Year is available on the IFAP Web site at: <http://ifap.ed.gov/cod/0210XMLCommonRecordSchema20c.html>. The 2004-2005 XML Schema is also available for schools on IFAP at: <http://www.ifap.ed.gov/cod/COD0405CRXMLSchema20d.html>.

Schools can also refer to the 2003-2004 & 2004-2005 COD Technical References- Volumes II, III, & IV Section 3 and the 2005-2006 COD Technical Reference- Volume II Section 3, <http://www.fsadownload.ed.gov/docsStudentAidGateway.htm>, for information on the Common Record layout.

What are some XML online resources that are available to schools and servicers?

Some online resources schools and third party servicers can review for information on XML include the following web addresses:

<http://www.w3.org>

<http://www.ebXML.org>

<http://www.oasis-open.org>

<http://www.pesc.org>

Sun's XML Java Technologies: www.java.sun.com/features/1999/03/xml.html

The XML Industry Portal: www.xml.org/xml/resources_cover.shtml

XML Software: www.xmlsoftware.com

Web reference-Exploring XML: www.webreference.com/xml/

XML Information: www.xml.com/index.csp

The XML FAQ: www.ucc.ie/xml

Does the Department of Education provide an XML translator (file converter)?

No. The Department does not own an XML translator. FSA does not plan to obtain a translator in the future.

How do schools obtain prior Award Year Pell Grant and Direct Loan information now that RFMS and DLOS are retired?

FSA has migrated all RFMS origination and disbursement data for award years 1999-2000 through 2001-2002 to COD. COD is now processing Direct Loan Archived Data for award years 1997-1998 and forward. As a result, schools have to access only one system (COD) to request data and report changes.

Both Pell Grant disbursement, and Direct Loan origination and disbursement data continues to be available in the National Student Loan Data System (NSLDS). In addition, Direct Loan data will continue to be accessible via the Direct Loan Servicing System (DLSS). A COD User Name and Password is required to access both the COD and Direct Loan Servicing Web sites (Single Sign-



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on). If you do not have a COD User Name and Password, you will not be able to access the DLSS website. Refer to Direct Loan Bulletin 03-40 for additional information, <http://www.ifap.ed.gov/dlbulletins/DLB0340.html>.

How do schools, third party servicers, and software developers obtain information about COD processing issues?

Schools, third party servicers, and software developers can obtain information about current production issues, news, and COD System functionality through various channels such as the COD Web site, <http://www.cod.ed.gov/>, and the IFAP Web site, <http://www.ifap.ed.gov>. The following communication sources provide information to COD users:

- *COD Web Messages*: COD posts messages on the COD Web site that provide users with information about COD processing, maintenance, holiday schedules, and new release functionality.
- *COD Processing Updates*: The COD Processing Update for Direct Loan and Pell Grants provides information on COD processing issues as well as reminders and helpful hints. It is published on the COD Web site daily by 12:00 noon (ET). Detailed information regarding the COD Processing Update is available on IFAP at: <http://www.ifap.ed.gov/eannouncements/0905CODUPDT.html>

Each Friday the COD Processing Update for Direct Loan and Pell Grants is posted as an Electronic Announcement on the IFAP Web site, www.ifap.ed.gov. If you have not done so already, COD encourages you to become an IFAP subscriber. IFAP subscribers can choose to receive a daily and/or weekly e-mail informing them when publications have been posted to IFAP. In order to subscribe to IFAP:

- 1) Go to the IFAP Web site, www.ifap.ed.gov.
- 2) Click on the *Member Services* link, located in the blue bar on the bottom left side of the IFAP Web site. The next screen will display Username and Password fields.
- 3) Click on the *Click Here to Register* link located under the Login button. This brings you to the *IFAP User Registration* screen.
- 4) On the *IFAP User Registration* screen, enter your information into the required fields. Click on the Submit Registration tab at the bottom of the IFAP Registration screen.

Once you are an IFAP subscriber, you can customize your notification by going back to the *Member Services* area of the IFAP Web site and selecting the *Subscription Options* link to customize your subscription.



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If you have any questions about the IFAP Subscription Notification, please contact the Customer Service Call Center at 800/433-7327 between 9:00 A.M. – 5:00 P.M. (ET). Questions can also be e-mailed to: fsa.customer.support@ed.gov.

- *Electronic Announcements*: Electronic Announcements are frequently posted on the IFAP Web site. These announcements provide updates on COD processing, functionality, and program requirements that affect both the Direct Loan and Pell Grant programs as well as updates that affect only the Pell Grant Program.
- *Direct Loan Bulletins*: Direct Loan Bulletins are frequently posted on the IFAP Web site. These bulletins provide updates on processing, functionality, and program requirements that affect the Direct Loan Program.
- *Pmessage (Pell Grant Message)*: Pmessages are placed in schools' SAIG mailboxes. These messages provide updates on processing, functionality, and program requirements that affect the Pell Grant Program.

What process is used to resolve COD System Issues?

Every COD System issue is reviewed and prioritized based on several impact criteria, including the number of students affected, the number of schools affected, and how the issue affects school funding. This method ensures resources are being focused on the overall critical areas.

When you report concerns to the COD School Relations Center via e-mail or phone, include specific examples of the issue and how the issue impacts your school and/or students. This information is forwarded to the issue resolution team and assists with the resolution and prioritization process.

Updates to priority issues are displayed in the COD Processing Updates. Updates on individual issues are passed to you through your Customer Service Representative.

Customer Service

Who do I contact when I need assistance with COD?

Schools, third party servicers, and software developers may contact the COD School Relations Center, by phone or e-mail, with questions regarding COD. Customer service representatives (CSRs) are available Monday through Friday, 8:00 A.M. - 8:00 P.M. (ET) at: 800/4PGRANT for the Pell Grant Program or 800/848-0978 for the Direct Loan Program. Customer service may also be reached via e-mail at: CODSupport@acs-inc.com.

Does my school have a primary customer service representative and what is his or her role?

Yes. The COD School Relations Center has assigned a primary customer service representative (CSR) to each school. COD customer service representatives are available to:



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- Answer COD processing questions about the Pell Grant and Direct Loan programs.
- Assist in obtaining access to the COD Web site as well as provide tips on web site navigation. The COD Web site is a great tool for processing and viewing Pell Grant and Direct Loan data.
- Assist in Full Participant registration (for schools that have not been set up in COD as a Full Participant).
- Assist with any additional concerns or questions regarding COD.

How do schools reach their primary CSRs?

Contact the COD School Relations Center at 800/4PGRANT for the Pell Grant Program or 800/848-0978 for the Direct Loan Program. COD customer service is available Monday through Friday, 8:00 A.M. - 8:00 P.M. (ET). When prompted, enter the school's Pell Grant-ID or Direct Loan School ID and the call will automatically be routed to the school's primary team. At this point schools can ask to speak with their primary CSR. If a member on the school's primary team is not available, the call will be routed to the appropriate backup. A voice mail message may also be left with COD customer service. Schools can also e-mail COD customer service at: CODSupport@acs-inc.com.

Do third party servicers and software providers have a primary CSR?

COD has assigned primary CSRs to third party servicers and software providers. Schools using the same third party servicer are assigned the same primary CSR as that servicer. To speak with a primary CSR call the COD School Relations Center at: 800/4PGRANT for Pell Grants or 800/848-0978 for Direct Loans. Third party servicers and software providers can enter their school's Pell Grant-ID or Direct Loan School Code. If a school code is not entered when prompted, the call will then be routed to the next available representative.

What support does COD customer service provide schools?

The COD School Relations Center has been fully staffed for over three years. Over that time, your COD Customer Service Representatives (CSRs) have gained a great deal of knowledge and experience. CSRs are eager and ready to build relationships directly with schools. There are a number of tools that alert CSRs to risk areas so they can work with schools to prevent any potential problems and meet regulatory and reporting requirements. Schools also receive support through the following customer service functions:

- Support to schools and third party servicers for testing school software applications with the COD System. Further information is available in an Electronic Announcement on IFAP at: <http://www.ifap.ed.gov/eannouncements/1223CODSchoolTesting.html/>.
- Support for XML (Common Record) issues.
- Updated version of the COD Computer Based Training available for download on the IFAP Web site at: <http://www.ifap.ed.gov/eannouncements/0408CODUpdateCBTWebsiteMarch04.html>.



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- Implementation of the Buddy System to connect schools that are new to XML (Common Record) processing with current Full Participants to exchange lessons learned and experiences.
- COD customer service outreach. A special team of “Early Bird” CSRs monitor batch processing from the previous business day and alert schools to potential issues. Schools are also notified when they have been identified as being impacted by a COD System issue.
- Specialized Reconciliation Team to assist schools in reconciliation and closeout.
- Updated communications about COD processing and features (DL Bulletin, Pmessage, etc.)
- Daily COD Processing Updates available on the COD Web site, <http://www.cod.ed.gov/>.
- Updated FAQs to share the answers to questions asked by schools. The FAQs are posted on the COD and IFAP Web sites.

Are there other sources of assistance for schools?

Yes. Schools can refer to the Sources for Assistance Guide available on FSA Download at: <https://www.fsadownload.ed.gov/SASTechRef.htm>. This guide includes helpful contact information for all Student Financial Assistance programs including frequently called help lines, phone numbers, e-mail addresses, and web site addresses that are found in technical references and desk references published by the Department of Education.

Schools can also refer to the COD School Relations and CPS/SAIG- Quick Reference Guide. This reference tool helps schools determine when to contact the COD School Relations Center, Applicant Services Department, vs. CPS/SAIG for assistance. The reference guide is located on the COD web site on the “Today’s Update” link, and is labeled “COD School Relations & CPS/SAIG-Quick Reference Guide”. Suggestions for additional topics that should be covered in the guide should be e-mailed to CODSupport@acs-inc.com with the subject line of “COD/CPS Guide Recommendations.”

The COD Web Site

What functionality does the COD Web site provide?

The COD Web site, www.cod.ed.gov, is a tool for processing and viewing Pell Grant and Direct Loan data as well as assisting schools with trouble-shooting and problem resolution. The web site provides the ability to access and/or view Pell Grant and Direct Loan reports, allows FSA, schools, third party servicers, and COD customer service to view and use the same award data when questions arise.



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How do schools and third party servicers get access to the COD Web site?

To get access to the COD Web site, a school must designate a School Security Administrator who is responsible for establishing other users at the institution and other associated procedures.

Schools can refer to the Electronic Announcement on the IFAP Web site, <http://www.ifap.ed.gov/eannouncements/0316UpdateCODWebsiteaccessforschools.html> for information on how to register a School Security Administrator, as well as how to grant access to additional school personnel, modify established accounts, and perform other Security Administrator functions.

Third party servicers are also able to obtain access to the COD Web site by referring to the Electronic Announcement on the IFAP Web site at: <http://www.ifap.ed.gov/eannouncements/0316UpdatedCODWebsiteaccessforthirdpartyservic.html>.

How do I reset my user access if I am locked out of the COD System?

Security Administrators are able to unlock the users they have established at their institution. However, if the Security Administrator needs to be unlocked, he/she must contact the COD School Relations Center. The Security Administrator is asked to provide his/her keyword. The keyword is used for security purposes to identify an administrator if he/she is locked out of the COD System or forgets his/her password.

When do COD User IDs become deactivated?

The COD System will deactivate COD User IDs when:

- A first-time COD user who has been assigned a User ID and password has not accessed COD for a consecutive six-month period; and
- An established COD user who has been assigned a User ID and password has not accessed COD for a consecutive three-month period.

School Users 1-4 and Third Party Users 1-4 should contact their System Administrators to reactivate their COD Web site User IDs. System Administrators (School User 5 and Third Party User 5) are the only users that need to contact the COD School Relations Center to reactivate their COD Web site User IDs. If you have any questions about reactivating your COD Web site User ID, please contact the COD School Relations Center.

Is a login name and password required to view data on the COD Web site?

COD Web site users have the ability to perform school and batch searches, view news and current issues of the daily COD Processing Update without having to log on to the site. However, student or borrower specific information such as Name, SSN, DOB and individual award data is governed by the Privacy Act of 1974, as amended, and is not displayed or made available without a valid log-on User ID and password.



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To view data without logging into the COD Web site, go to www.cod.ed.gov. Click on the “School Search” or “Batch Search” buttons on the top bar.

- By clicking on School Search, users can enter a school ID or school name to view basic information about the school, such as school name and address, financial aid administrator contacts, and some summary financial information by program type (Pell Grant or Direct Loan).
- By clicking on Batch Search, users can enter a school ID and date range, or a specific batch ID to view the status of a particular batch along with the number of records that have been accepted, rejected, and corrected.

Does the COD Web site have security measures in place?

COD has security measures in place to prevent security infringement. The COD System automatically blocks any IP address from accessing the web site if subsequent activity within COD is determined to put the security of the COD environment or data within the COD System at risk. If an IP address is blocked, the COD School Relations Center contacts the COD user. Additionally, the software used by the COD Web site prevents internet browsers (Example: Internet Explorer, Netscape) from storing (or cache) data protected by the Federal Privacy Act on personal computer hard drives. Refer to the Electronic Announcement on IFAP at: <http://www.ifap.ed.gov/eannouncements/1124CODWebsitesecurity.html>.

How do schools update their contact information on the COD Web site?

Schools can update their Pell Grant and/or Direct Loan program’s contact information on the COD Web site from the School tab and then click on the “Financial Aid Contact” link. COD will display the current information for your institution. You are then able to update or add new financial aid contact information by clicking on the “Update” or “Add New” tab.

Please keep in mind that the Financial Aid Administrator or Director of Financial Aid e-mail address is used to deliver time sensitive materials, containing critical COD processing related information, to your school. Please ensure this contact information contains the most current e-mail address.

Updates to school information such as school name, school address (including branches and locations), names of the Chief Executive Officer/President, Chief Financial Officer, and Director of Financial Aid must be reported by using the Electronic Application for Approval to Participate in Federal Student Financial Aid Programs (E-App) at: <http://www.eligcert.ed.gov>. Once the information is submitted through E-APP, the COD Web site is normally updated with the new information in 24 hours. It may take longer if there is additional information required by Case Management and Oversight Division.

School can also refer to IFAP for information on updating school contact information in COD, <http://www.ifap.ed.gov/eannouncements/1126UpdateContactInfoinCODSys.html>.



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How do schools view Pell Grant and Direct Loan data for concurrent award years on the COD Web site?

COD has the capacity to process records for multiple open award years simultaneously. Schools and third party servicers can access the COD Web site and view specific award year data by utilizing the award year dropdown box and selecting the desired award year.

The award year dropdown box for the Direct Loan program lists award years 2002-2003 through 2005-2006. The award year dropdown menu for the Pell Grant program lists award years 1999-2000 through 2005-2006. The award year dropdown box is available on the following screens:

- Person All Awards Information
- Person Pell Information
- Person Direct Loan Information
- School Search
- School Summary Information
- School General Information
- School Options Information
- School Funding Information
- School Summary Financial Information
- Refunds of Cash Information
- Cash Activity
- School Yearly Totals
- Batch Search

Note: The award year dropdown box on the Person All Awards Information, Person Pell Information, and Person Direct Loan Information screens only displays award years for which the student has an accepted award.

Additionally, once the program and award year are selected from the Default Program and Default Award Year dropdown boxes on the School Search screen, all subsequent School and Program screens will default to and display that program and award year until another default selection is made on the School Search screen or the School Summary screen.

How often is Pell Grant and/or Direct Loan disbursement information updated on the COD Web site?

Disbursement information is updated on the COD Web site after a school's batch is processed. However, the reflection of the actual disbursements in the school's disbursement totals (for example, Net Accepted and Posted Disbursements and Net Accepted and Posted Disbursements Applied) will not be reflected on the COD Web site until after the COD System's overnight processing/posting has been completed.



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How are PLUS credit checks performed?

PLUS credit checks can be performed two ways.

- Schools can perform an abbreviated credit check by accessing the COD Web site Credit Check Search screen at: <http://www.cod.ed.gov/>. Enter the borrower's social security number and date of birth. Click "Request Credit Check".
- The COD System performs a credit check when a PLUS origination is received and a credit check has not been performed within 90 days.

Sending/Receiving Data in the COD Environment

How do I send records to COD?

In previous years, schools had the option of sending their records to COD as either a Full Participant or Phase-In Participant. However, beginning with the 2005-2006 Award Year, schools must send their records to COD as Full Participants.

The term Full Participant means schools use the Common Record in XML format to submit Pell Grant and/or Direct Loan origination and disbursement data to the COD System by sending batches via the Student Aid Internet Gateway (SAIG), or by utilizing the COD Web site. Schools that use EDExpress for Pell Grants and/or Direct Loans are COD Full Participants.

Schools that use third party servicers should consult with their servicers about specific software package capabilities and features prior to sending data to COD.

Will COD process batches that contain improper XML formats?

Batches submitted to COD containing improper XML formats will not be processed or displayed on the COD Web site. COD customer service takes a proactive approach in contacting and assisting schools in this situation. Customer service notifies the school that the batch was not processed and provides the school with the reason and action required to correct the batch.

What is the COD Routing ID?

As part of an initiative to establish a common school identifier across Title IV delivery systems, FSA began assigning new identifiers to COD Full Participants in 2002-2003. This new identifier, formerly known as the Common School Identifier or CSID, has been renamed the "Routing ID" and is used for 2002-2003 and forward.

The Routing ID is an eight (8) character, numeric key that is randomly generated. The values in the key do not signify any information about your school except its identity. A Routing ID has been established for all postsecondary schools and third party servicers, and it must be used when submitting Pell Grant and/or Direct Loan records.



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Schools must use the Routing ID when submitting Common Records to COD. **Note:** The Routing ID is used in the four required Entity ID tags in the Common Record: Source Entity ID, Destination Entity ID, Reporting Entity ID, and Attended Entity ID. Additional information is available in the 2003-2004, 2004-2005, and 2005-2006 COD Technical References at: <https://www.fsadownload.ed.gov/docsStudentAidGateway.htm>.

Note: For the 2003-2004 Award Year and forward, EDEExpress users are required to populate "Entity ID" fields on the Pell Grant and Direct Loan setup screens in EDEExpress. The Entity ID fields must be populated with a valid Routing ID. Populating the Entity ID fields correctly is crucial in ensuring that Pell Grant and Direct Loan data exported to COD via EDEExpress can be identified and processed accurately. For more information on how to set up EDEExpress refer to the posting on IFAP at: <http://www.ifap.ed.gov/eannouncements/0507CODEDERoutingIDs.html>.

Can we test our system with COD prior to sending production records?

Although most software vendors test with COD prior to the release of their application (including EDEExpress), school testing is available to Full Participants as well as third party servicers and software providers. This affords everyone the opportunity to test their software with the COD System prior to the transmitting and processing of production data.

School testing is now complete for the 2005-2006 Award Year. Watch for announcements regarding school testing for Award Year 2006-2007 on the IFAP Web site later this year.

Where can schools find information on message classes that are to be used for sending and receiving Pell Grant and Direct Loan records to and from the COD System?

For information regarding 2004-2005 and 2005-2006 message classes, refer to the 2004-2005 and 2005-2006 COD Technical References at <https://www.fsadownload.ed.gov/docsStudentAidGateway.htm>.

COD has enhanced message class functionality for the 2004-2005 and 2005-2006 Award Years. Schools will be able to choose from several different message class options in which they can send data to and receive data from the COD System. These message class options include the following:

- Non-program specific and non-award year specific
- Non-program specific and award year specific
- Program specific and award year specific
- Program specific and non-award year specific

The complete list of 2004-2005 and 2005-2006 message classes is available in the 2004-2005 and 2005-2006 COD Technical References at:

<http://www.fsadownload.ed.gov/CODTechRef0405.htm> and
<https://www.fsadownload.ed.gov/CODTechRef0506.htm>.



Frequently Asked Questions

Will the Student Aid Internet Gateway (SAIG) Transmission Batch Header for a Response acknowledgement contain the same data that a school submits on an incoming record?

Since COD System implementation for the 2004-2005 Award Year, COD has increased the batch number on the SAIG Transmission Batch Header from positions 42-67 to 42-91 allowing the entire Full Participant document ID to be returned with the Response. Positions 42-61 are reserved for school use and are returned to schools with the same information submitted on the incoming record. However, positions 62-91 are reserved for use by the Department. Therefore, any data submitted in positions 62-91 will be overwritten with the Batch/Document ID.

Note: EDConnect users must upgrade to EDConnect version 5.3 or higher in order for their records not to reject. The latest version of EDConnect is 6.0.

Where can schools find information on Country Code values that are submitted in a Common Record document?

Schools should refer to the 2003-2004 & 2004-2005 COD Technical References-Volume VIII Section 4, <https://www.fsadownload.ed.gov/docsStudentAidGateway.htm>, or the 2005-2006 COD Technical Reference- Volume VI Section 4, <https://www.fsadownload.ed.gov/docsStudentAidGateway.htm> for information on the appropriate Country Code values that are submitted on a Common Record document.

Schools can also find a complete listing of appropriate country code values in the XML Schema version 2.0c for the 2003-2004 Award Year, <http://www.ifap.ed.gov/cod/0210XMLCommonRecordSchema20c.html>. For the 2004-2005 & 2005-2006 Award Years, refer to the XML Schema version 2.0d, <http://www.ifap.ed.gov/cod/COD0405CRXMLSchema20d.html>.

How are batches acknowledged by COD?

After COD receives a document using the XML Common Record, the system generates a receipt. A receipt is an XML document sent to schools informing them that COD was able to read the XML document they submitted.

COD also responds to each school's data submission files with a response that indicates what data were accepted and what data were rejected. For all 2003-2004, 2004-2005, and 2005-2006 Common Record documents, the response is returned in the latest XML Schema version that exists for that award year. Detailed information regarding the XML Schema versions used for Common Record documents is available as an Electronic Announcement on the IFAP Web site, <http://www.ifap.ed.gov/eannouncements/0310CODSchemaChange0405.html>.

When a school submits data via the COD Web site, the option is available to receive a response via the school's SAIG mailbox. Schools will not receive a response for web-based transactions unless they have requested to receive web responses under the COD Web site's School Options Information screen.



Frequently Asked Questions

Do schools and third party servicers have any options about how they receive responses?

Full Participants have an option to receive a Full or Standard response for Common Records processed by the COD System. A Full response contains all the original tags (data elements) sent by the school, including any rejected data elements and reason codes. A Standard response contains only the rejected data elements and reason codes.

Depending on the application your school uses, you may be able to choose the response you want to receive by setting this option on the School Options Information screen on the COD Web site. EDExpress users will always receive a Full Response. For other schools, if a response option has not been chosen, the option default is the Standard response. Schools can also override the standard response default on a record-by-record basis, by submitting the <FullResponseCode> tag on the Common Record.

Can schools determine the maximum number of characters that will be included in each line of an acknowledgement/response?

Schools can determine the maximum number of characters that will be included in each line of a response. Schools can view the "Record Length for XML" field under the COD Web site School General Information screen for information on the maximum length of their record.

The "Record Length for XML" field stores the maximum number of characters that will be included in each line of a Common Record response. The default for the 'Record Length for XML' field, for schools will be set to 0. This means that the Common Record responses sent back will contain one tag (data element) per line.

Note: One tag per line makes the response easier to extract information from and easier to read. However, this format returns trailing spaces for a fixed length of 200. To reduce the number of trailing spaces schools may contact COD customer service to change the "Record Length for XML" field to include more than one tag per line.

Where can schools and third party servicers view information on a batch submitted to COD?

Schools and third party servicers can view information on a batch submitted to COD by accessing the COD Web site's Batch Detail Information screen. The Batch Detail Information screen displays batch statistics and the status of all records in the batch.

Schools and third party servicers can also view the actual data they submitted to COD by accessing the Record Information screen. In addition, the response sent from COD can be viewed by accessing the Response Information screen.

To access the Record Information screen:

- Click on the Accepted link under the SSN, Award No, or Disb No columns on the Batch Detail Information screen. The Record Information screen displays.



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Or

- Click on the Rejected or Accepted with corrections link under the SSN, Award No, or Disb No columns on the Batch Detail Information screen. The Record Errors screen displays.
- From the Record Errors screen, click on the View Record button at the bottom of the page to view the data submitted to COD.

To access the Response Information screen:

- Click on the Accepted link under the SSN, Award No, or Disb No column on the Batch Detail Information screen. The Record Information screen displays.
- From the Record Information screen, click on the View Response button at the bottom of the page. The Response Information screen displays.

Or

- Click on the Rejected or Accepted with corrections link under the SSN, Award No, or Disb No column on the Batch Detail Information screen. The Record Errors screen displays. From the Record Errors screen, click on the View Response button at the bottom of the page to view the response COD sent.

How do I correct data in COD?

Full Participants can make individual student data corrections via batch processing. Full Participants submit changed data.

Additionally, Full Participants are able to make individual student data corrections online through the COD Web site. Full Participants do not receive responses for web-based activities unless they have requested the option on the COD Web site School Options Information screen.

Additional information on correcting data is available in the 2003-2004, 2004-2005, and 2005-2006 COD Technical References at:

<https://www.fsadownload.ed.gov/docsStudentAidGateway.htm>.

Can schools update an origination ID after a student record is established in the COD System?

No. One of the benefits of the COD System is a student-centric approach to record processing. Each Award Year, each student recipient, or PLUS borrower, has a single “person” record, even if the student receives both a Pell Grant and a Direct Loan. Once the award, or origination ID, is established in COD, it stays with the student for the entire award year. Further information is available at: <http://ifap.ed.gov/eannouncements/0113CODPellOrigID0203.html>.

Under what conditions can schools request Pell Administrative Relief (Pell Post Deadline Processing)?

Schools that need to report originations and disbursements for new awards, award amount increases, or disbursement increases after the published Pell processing deadline for an award year must request Pell Administrative Relief or Extended Processing or the records will be



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rejected by the COD System. A school can request Administrative Relief or Extended Processing via the COD Web site or via e-mail.

Note: After the published Pell processing deadline for an award year, the COD System continues to accept and process decreases to previously accepted awards and disbursements. In addition, if a student was in a Potential Overaward (POP) situation during the award year, the COD System continues to accept and process increases and decreases to new awards or previously accepted awards for this student.

For additional information about when the Department can grant Administrative Relief and Extended Processing and how a school can make this request, refer to the Electronic Announcement posted on the IFAP Web site at <http://www.ifap.ed.gov/eannouncements/0902PellProcDeadline0304.html>.

Promissory Notes

Where do schools send paper Master Promissory Note (MPN) manifests for all award years?

Paper MPN manifests for all award years should be mailed to Montgomery, Alabama for processing. There are two separate mailing addresses, depending on how you choose to send the MPNs. Please use the correct address below to ensure timely receipt of the manifests by the processing center.

Overnight, Express, or Certified Mail should be sent to:

Department of Education
201 TechnaCenter Drive
Montgomery, AL 36117

Regular Mail should be sent to:

Department of Education
P.O. Box 5692
Montgomery, AL 36104

Where do schools send paper MPNs for testing?

Schools that produce MPNs for their students can send MPNs for testing to the following mailing address:

Department of Education
Document Testing
P. O. Box 5691



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Montgomery, AL 36103-5691

Documents and shipping packages must be clearly marked "For Testing Only". This ensures MPNs sent for testing are not processed as production MPNs. The processing center reviews the submitted MPNs for accuracy and provides feedback to the school.

What happens to paper MPNs upon receipt by the processing center?

When the processing center receives paper MPNs, two processes are started. First, the shipping manifest is reviewed and compared to the MPNs received. Secondly, the MPNs are reviewed and, if eligible for processing, are scanned into the imaging system within three business days. Once the MPNs are successfully imaged, the manifest is separated from the MPNs, batched, imaged, verified, and returned to the school. During peak processing, it can take up to ten business days for the manifest to be returned to the school.

What happens if an error is found when processing a MPN?

The data is verified to ensure that the MPN was successfully imaged before it is transferred to COD. If an error is found with an imaged MPN, such as a miskey or an error on the MPN itself, the manifest processing is put on hold until the problem is resolved. When an error is identified, only the affected MPN is pulled from the batch and re-processed. The remainder of the batch is considered verified and is released.

What can be done to reduce the number of MPN processing errors?

In order for an MPN to link to an award, data from the MPN must match the same data in the borrower record (SSN, the borrower's date of birth, and the first two characters of the borrower's first name). Both COD and schools can help make sure this data is accurate and matches.

COD uses a double data entry and verification process to minimize data entry errors. The double data entry process allows COD to validate the data from the MPN twice before the data is released for linking to an award. In cases where any of this data is legally altered on the MPN, but the altered data does not match the borrower record, the MPN does not link to the award. Schools can prevent errors by ensuring that altered data on the MPN is researched and verified against the award data in COD *prior to* submitting the MPN for processing. Hand-written data on MPNs also increases error rates. To ensure that hand-written MPNs are processed correctly, please make certain that hand-written data on the MPN is *legible*.

When a paper MPN cannot be processed due to invalid alteration, it is returned to the school for correction or completion of a new MPN. The shipping manifest is annotated to reflect the reason it was returned to the school. Some reasons for returned MPNs may include a missing signature or no shipping manifest received with the MPN. MPNs are returned to the school as soon as an error is found. The original shipping manifest is returned to the school at a later date.



Frequently Asked Questions

How does MPN information get into COD?

During the imaging process of the paper MPNs, certain key data elements (SSN, Name, DOB) are gathered into an electronic data file. This data is transmitted to the main COD database in a real-time method. For an MPN that is completed electronically at <http://dlenote.ed.gov/> the key data elements are transmitted to the main COD database after the borrower completes the electronic process. COD uses the data elements to successfully link the MPN to an eligible award and sends an MPN (response) to the school's SAIG mailbox.

When can schools check the status of an MPN on the COD Web site?

For paper MPNs, schools do not have to wait until they receive the manifest back before checking the status of an MPN. Once an MPN is successfully imaged, the data is sent to the main COD database. Schools can access the COD Web site's Pnote Search screen for information on the status (linked, unlinked, pending or rejected) of an MPN.

It is recommended that schools allow sufficient time for paper MPNs to reach the processing center plus an additional three days for the MPNs to be processed before checking on the status of paper MPNs in COD.

Electronic MPN information is updated in COD throughout the day. When an applicant advises a school that he or she successfully completed an e-MPN, the school can verify that the application process was successful on the Direct Loans Master Promissory Note (e-MPN) Web site, <http://dlenote.ed.gov/>. To do this, click on the Login to e-MPN Online link, select "e-MPN Search" and enter the applicant's SSN and date of birth. If the e-MPN process was successful and the school did not receive an acknowledgement, the school should contact the COD School Relations Center for assistance.

What if an MPN can't be found in COD?

When COD is notified that an MPN is misplaced, is not linked to an award, or is not acknowledged to a school (school does not receive an MPN response), COD will perform the following

- 1) Confirm if the MPN/Manifest was received and processed in the Imaging System.
- 2) If confirmed that the MPN/Manifest was received and processed in the Imaging System but not linked, COD will research the root cause of the issue.
- 3) If confirmed that the MPN/Manifest was not received and processed in the Imaging System, COD will work with EDS to locate and/or process the missing MPN/Manifest.

To assist in this search, schools are requested to provide the shipping container tracking number, the date on which the container was signed, the weight of the container, and a copy of the shipping manifest.



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Are schools able to require borrowers to complete an MPN electronically?

No. Schools may not require borrowers to complete an MPN electronically. Borrowers may choose to complete a paper MPN. For more information, refer to Direct Loan Bulletin 03-42, <http://www.ifap.ed.gov/dlbulletins/DLB0342.html/>.

What is a linked/unlinked Master Promissory Note (MPN)?

A linked MPN is an MPN that is associated with an accepted award(s) in COD. An unlinked MPN is an MPN that is not associated with an award(s).

Are there different features of an MPN?

There are 3 different features of an MPN: Multi-Year, Single-Year, and Single-Loan.

Under the Multi-Year (MY) feature, Direct Loan schools may allow their student borrowers (and their parent borrowers under the PLUS MPN) to receive loans for subsequent academic years based upon a valid MPN on file at COD. For details regarding school eligibility for the MY MPN feature refer to the Dear Colleague Letter GEN-02-10, <http://www.ifap.ed.gov/dpcletters/Gen0210.html>, or DLB 03-07, <http://www.ifap.ed.gov/dlbulletins/DLB0307.html>.

The Single-Year (SY) MPN feature requires that a new MPN be completed by a student or parent borrower for each academic year. A school using this feature must have a borrower sign an MPN generated by or for that school.

The Single-Loan (SL) MPN feature applies to a PLUS MPN linked to a PLUS loan for which a parent has obtained an endorser who does not have an adverse credit history. The SL MPN is for the one PLUS loan the parent borrows and the endorser agrees to repay if the parent does not repay the loan.

Refer to the 2003-2004 COD Technical Reference- Volume II & IV Section 1 or the 2004-2005 and 2005-2006 COD Technical References- Volume II Section 1 <https://www.fsdownload.ed.gov/docsStudentAidGateway.htm>, for details regarding MPN features.

Can multiple loans for a borrower be linked to the same MPN?

Under the MY MPN feature and the SY MPN feature, multiple loans for a borrower can be linked to the same MPN. However, under the SY MPN feature, the academic year start and end dates must be the same on all loans linked to a specific MPN. If the academic year start and end dates do not match, the loan will not link to the same MPN. As a result, the school will need to obtain a new MPN for the unlinked loan.



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Once a Single-Loan (SL) MPN is established for a PLUS loan with an accepted endorser, it becomes inactive. Therefore, no other PLUS loans can be linked to that same PLUS MPN. If a borrower wants to borrow subsequent PLUS loans, he or she needs to sign a new MPN.

The complete business rules surrounding this process are available in the 2003-2004 COD Technical Reference-Volume II & IV Section 1, or the 2004-2005 & 2005-2006 COD Technical References-Volume II Section 1, <https://www.fsdownload.ed.gov/docsStudentAidGateway.htm>.

When does a Direct Loan Subsidized/Unsubsidized and PLUS MPN link to an award?

When COD receives an MPN and an accepted subsidized/unsubsidized award is already on file and not yet linked to an MPN, the MPN and the award will be linked, provided that all student data elements on the MPN match the data elements on the award 100%. If there are no accepted awards already on file, the MPN will not be linked.

When a PLUS MPN is received and an accepted PLUS award with a positive credit check decision is already on file and not linked to an MPN, the PLUS MPN and the PLUS award will be linked, provided that all student and borrower (parent) data elements on the MPN match the data elements on the award 100%.

What criteria is used for linking an MPN to a Direct Loan Subsidized/Unsubsidized and PLUS award?

COD links an MPN to an accepted Direct Loan Subsidized/Unsubsidized award using the following student data elements:

- Current SSN
- Current Date of Birth
- First two characters of the first name OR the first two characters of the last name (if the first name is blank or doesn't consist of two alpha characters).

In the case of a PLUS MPN the data elements listed above will be applied to both the borrower (parent) and student.

How is an MPN expiration date calculated?

The MPN expiration date is calculated differently based on the status of the promissory note.

- For a pending MPN (one that does not yet have an award linked to it), the expiration date is calculated as the date the MPN is received by COD for processing plus 1 year. If the promissory note is not linked within 1 year, it expires. The school will need to obtain a new note from the student if there is no activity within 12 months.
- For an MPN that has been linked but has no award with an accepted actual disbursement, the expiration date is calculated as the date the MPN is received by COD for processing plus 1 year. If the award linked to the MPN does not have an actual/funded disbursement



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within 1 year it expires. The school will need to obtain a new note from the student if there is no actual/funded disbursement activity within the first 12 months after COD receives the MPN for processing.

- For an MPN that has been linked and has at least one award with an accepted actual disbursement, the expiration date is calculated as the date the MPN is received by COD for processing plus 10 years.
- The COD System accepts an actual disbursement (Full Participant Disbursement Release Indicator = true) for any award linked to an MPN. This occurs, even if the MPN has expired, only when the award is already linked to the MPN and the disbursement successfully passes all other disbursement edits for being accepted by the COD System.

If the accepted disbursement is the first actual disbursement under the MPN and the date of that disbursement is on or before the MPN expiration date, the MPN expiration date is recalculated using the date the MPN was received at COD for processing plus 10 years and the MPN is reactivated (Accepted Status).

What happens if the first actual disbursement is received and the date of that disbursement is after the MPN expiration date?

If the first actual disbursement under the MPN has a date that is after the MPN expiration date, the MPN expiration date remains unchanged and the MPN status remains inactive. A new promissory note is then needed for that disbursement.

Schools can refer to the 2003-2004, 2004-2005 & 2005-2006 COD Technical References, <https://www.fsdownload.ed.gov/docsStudentAidGateway.htm>, for information regarding the Direct Loan Subsidized/Unsubsidized and PLUS MPN) linking process and calculating the MPN expiration date.

Will the COD System accept subsequent disbursements for an award that is linked to an expired MPN?

The COD system will accept a subsequent disbursement for an award that is linked to an expired MPN. In this case, the MPN expiration date remains unchanged and the MPN status stays the same.



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COD Student Identifiers & CPS Matching

What person information is used to establish a student on the COD database?

A student is established on the COD System database once required “person” information is successfully matched to identifying information on the CPS database. For a Pell Grant, the student’s Social Security Number, DOB and first two letters of his or her Last Name are compared to CPS data. For a Subsidized/Unsubsidized loan, the student’s SSN and DOB are compared to CPS data. If the match is successful, the student is established on the COD database with the COD Student Identifier. The COD Student Identifier consists of the current Social Security Number, current Last Name and DOB. **NOTE:** The COD Student Identifier differs from the student identifier used for reporting Pell Grants in years past (was Origination ID). For additional information refer to the following link:

<http://www.ifap.ed.gov/eannouncements/0113CODPellOrigID0203.html>.

Which student identifiers does COD match against the Central Processing System (CPS)?

In addition to comparing student data to CPS to establish a student on the COD database (previous question), COD does a second match with CPS using the award transaction number when establishing awards on the COD database. COD uses the CPS Transaction Number submitted to pull data elements from CPS for processing the award.

When a record contains a new student with a new Pell Grant Award, COD matches the SSN, Date of Birth, first two characters of the Last Name, and the CPS Transaction Number with data from CPS. When a record contains a new student with a Subsidized or Unsubsidized Direct Loan award, COD matches the SSN, Date of Birth, and the CPS Transaction Number with data from CPS.

Refer to the 2003-2004, 2004-2005, and 2005-2006 COD Technical References -Volume II Section 1 <https://www.fsadownload.ed.gov/docsStudentAidGateway.htm>, for complete information on this topic.

How do schools and third party servicers change student identifiers on the CPS and COD System?

In order to change Student Identifier information on the CPS, the school or student must submit a correction to the ISIR/SAR (this will result in a new transaction in CPS). After the correction has been submitted to the CPS, the school must send the changed data to the COD System reporting the old student identifier and the new student identifier (SSN, DOB, or Last Name). COD stores ONLY one Student Identifier for each student; COD does not store separate Student Identifiers for each award.



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Where can schools view information the CPS has for students?

Schools may access the COD Web site's Applicant search screen to view student information received from CPS via the Abbreviated Applicant file.

Additionally, schools can view ISIR data the CPS has for students via FAA Access to CPS Online web site at: <http://www.fafsa.ed.gov/FOTWebApp/faa/faa.jsp>. If you do not have access to the site, the Destination Point Administrator (DPA) for your TG number can register you as a user. Your DPA should go to the SAIG Enrollment Site at <http://www.fsawebenroll.ed.gov> and select "FAA Administration" to enroll people as FAA Users. All FAA Users will receive a PIN, which is required for access to the FAA Access to CPS Online site.

Keep in mind that student identifiers such as Social Security Number, last name, and/or date of birth CANNOT be updated online. Updates to student identifiers can be made by the school creating an electronic ISIR correction or by the student submitting a corrected paper SAR. If you have any questions about the FAA Access to CPS Online Web site, please contact CPS/SAIG Technical Support at 800/330-5947 or via e-mail at cpssaig@ed.gov.

Which data elements are pulled from CPS?

The COD System determines if certain data elements are transmitted in Common Records or already exist for the student and award year on the COD database. If neither is true, the COD System will 'pull' these data elements from information provided by the CPS.

For each Pell Grant award received, the following data elements are pulled from the CPS information when absent on both the record and the COD database: Address, Loan default/Grant overpayment for student and citizenship status.

For each Direct Loan award received, the following data elements are pulled from the CPS information when absent on both the record and the COD database: Address, Loan default/Grant overpayment for student, citizenship status and Dependency status. **Note:** Citizenship status cannot be pulled from the CPS for PLUS loans and, therefore, is required on records for PLUS loans.

Frequent COD Data Edits

What resources can schools refer to for information on Pell Grant and Direct Loan edits?

Schools can refer to the 2003-2004 & 2004-2005 COD Technical References, Volume II, III, & IV Section 4 or the 2005-2006 COD Technical Reference, Volume II & III Section 4 at: <https://www.fsadownload.ed.gov/docsStudentAidGateway.htm>. Schools can also access the COD Web site, www.cod.ed.gov, Help link for information on Pell Grant and Direct Loan edits.



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Are the COD data elements and edits the same for all programs?

The COD System takes advantage of commonality across programs to maximize the use of common data elements, edits, and a single student record. Student and parent recipient data, such as name, social security number, date of birth, and other non-program specific data are stored once, so a student/recipient will have one identifier record in COD for all programs. Edits that relate to general school and student eligibility are also the same across programs. However, some program specific data, such as Pell Grant disbursement amounts, do have unique data elements and edits and are applied as warranted.

Why are we receiving edits for “No eligible SSN, DOB, and last name combination match on CPS for a student”?

Schools will receive COD Edit 011, “No eligible SSN, DOB, and Last Name Combination Match On CPS for Student” when the Student Identifier (SSN, DOB, and Last Name) reported on the record cannot be found on the CPS. To resolve this edit, schools will need to:

- Verify the social security number, date of birth or last name submitted with the CPS.
- Resubmit the record with the correct identifier(s) to COD, or update the CPS and resubmit the record with the CPS transaction number that matches the current identifier.

How should schools resolve an “Invalid Destination Mailbox ID” error?

Schools will receive COD Edit 001 when the Entity ID is invalid or not assigned to send Pell Grant or Direct Loan data from that SAIG Destination Mailbox. Schools can resolve this edit by resubmitting the batch using the appropriate SAIG Destination Mailbox ID. Contact CPS/SAIG customer service at: 800/330-5947, with concerns regarding the appropriate SAIG Destination Mailbox ID.

What edit does COD apply to ensure that Direct Loan disbursement dates are in chronological order?

If a school submits a Direct Loan record with a subsequent disbursement date that is not after the disbursement date of the first disbursement, the record is rejected for COD Edit 052 (First Disbursement Must be the earliest). This edit only applies to Direct Loan and ensures that all anticipated and actual disbursement dates are in chronological order.

Schools that encounter this edit should review the disbursement dates of the rejected record and first disbursement (disbursement with the First Disbursement Indicator [FDI] flag set to true). If the date of the Disbursement submitted is earlier than the date of the first disbursement, and that date is incorrect, update this information and resubmit.

What are FSA’s operational procedures related to a borrower’s pending bankruptcy?

Effective May 3, 2004, FSA changed its operational procedures related to pending bankruptcies based on the fact that each loan and disbursement under a Master Promissory Note (MPN) is clearly identifiable by date and can be identified as having been made before or after a borrower’s



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bankruptcy filing. FSA announced and explained the change in Direct Loan Bulletin 04-14 at <http://www.ifap.ed.gov/dlbulletins/DLB0414.html/>. Beginning May 3, 2004, the COD System does not—

- Inactivate and flag a borrower's MPNs that were received before the borrower filed for bankruptcy;
- Require a new MPN for loans that are made after the borrower filed for bankruptcy (unless the MPN has otherwise expired); and
- Reject disbursements that were made after the borrower filed for bankruptcy.

Accordingly, COD Edit 89 (when the disbursement date submitted on a record is after the borrower filed for bankruptcy) is no longer applicable.

We are NOT including address fields in 04-05 award data and are getting warning Full Participant Warning Edit 120. Are 05-06 rules being improperly applied to 04-05 files?

Following implementation of the 2005-2006 software in March 2005, COD began returning Full Participant Warning Edit 120 (Incomplete address; complete address exists on the COD System. For Direct Loan PLUS only, student address is incomplete). *This warning edit applies to all award types and all award years, including 2004-2005 and earlier. The edit is returned every time the incoming record does not include a complete address tag.*

Reconciliation Tools for Schools

What assistance does COD customer service provide for reconciliation?

COD customer service takes a proactive approach in assisting schools with reporting disbursements within the 30-day reporting requirement by performing outreach to schools. CSRs monitor reporting and drawdown activities and work with schools to prevent and resolve potential reconciliation issues. The COD process provides a number of reconciliation tools.

What reconciliation tools does the COD Web site offer?

The COD web site provides a number of reconciliation tools, including several reports and COD web site financial screens. Financial aid offices and business offices can both view drawdown and reporting activity as well as the data the COD System uses to "age" and "substantiate" the funds drawn. The following screens provide schools with information to assist in the reconciliation process:

- *School Funding Information* screen provides users with information on a school's total accepted disbursement amount, amounts that were not disbursed, and information schools may use to determine the amount of available funds.
- *School Summary Financial Information* screen allows users to view a summary of a school's Pell Grant and Direct Loan financial information.



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- *Cash Activity* screen provides users with information on all drawdowns for a particular school.
- *Yearly Totals* screen provides users with information regarding a school's total awards, total amount disbursed, total number of duplicated recipients, and the total number of unduplicated recipients.

Are there reports available to help schools reconcile?

Yes. There are Direct Loan and Pell Grant reports available to assist schools with their reconciliation processes. The COD System pushes reports to schools' SAIG mailboxes, allows schools to view reports, and fulfill requests for reports via the COD web site and/or batch process.

Schools can refer to the COD Technical Reference

<https://www.fsdownload.ed.gov/docsStudentAidGateway.htm>, for the 2003-2004, 2004-2005 & 2005-2006 report layouts.

The list below describes the Direct Loan and Pell Grant reports schools may find useful in the reconciliation process.

Direct Loan Reports:

MPN Discharge Report: The MPN Discharge Report is sent on a weekly basis to the SAIG mailboxes (Message Classes MPNDISOP) of Reporting schools. This report contains data on MPNs that have become inactive within the last 30 days due to discharges for death or an unauthorized signature.

Expired MPN Report: The Expired MPN Report is sent on a weekly basis to the SAIG mailboxes (Message Class MPNINAOP) of Report schools. This report contains data on MPNs that have expired within the last 30 days due to any of the following reasons:

- MPN inactive due to no awards linked within a year of the date of receipt;
- MPN inactive due to no actual disbursements on a linked award within a year of the date of receipt;
- MPN inactive due to 10 years passing since the date of receipt; or
- MPN inactive due to a PLUS award linked with an Endorser.

Note: The first time the report is generated it will contain all MPNs that have become inactive within the last 365 days.



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MPNs Due to Expire Report: The MPNs Due to Expire Report is sent on a monthly basis to the SAIG mailboxes (Message Class MPNEXPOP) of Reporting schools. This report contains data on MPNs that will expire within the next 60 days due to any of the following reasons:

- MPN inactive due to no awards linked within a year of the date of receipt;
- MPN inactive due to no actual disbursements on a linked award within a year of the date of receipt; or
- MPN inactive due to 10 years passing since the date of receipt.

Note: All three of the reports above will also be sent to the SAIG mailboxes of Attended schools with loans linked to the MPNs, as well as to the Attended schools that created the MPNs listed in the reports. Additionally, these reports will be available in the Attending and Reporting schools' Newsboxes on the COD web site. **30-Day Warning Report:** The 30-Day Warning report is generated on the first Saturday of each month and is sent to schools' SAIG mailboxes (Message Class DIWCxxOP) the following Monday. It is also available on the COD Web site. This report lists unbooked Direct Loans for which the COD System has not received one or more of the three required elements (accepted origination record, disbursement record, and MPN) for "booking" a loan.

Pending Disbursement List: The Pending Disbursement List (formerly the Anticipated Disbursement Listing) is generated each weekend and is sent to schools' SAIG mailboxes (Message Class DALCxxOP) on the following Monday. It is also available on the COD Web site. Schools can use the Pending Disbursement List report to determine estimated disbursements and disbursement dates on file on the COD System.

Funded Disbursement List: The Funded Disbursement List (formerly the Actual Disbursement Roster) is generated and sent to schools' SAIG mailboxes (DARCxxOP) daily. This report is also available on the COD Web site. The Funded Disbursement List report displays all disbursements that have been funded.

Duplicate Student Borrower Report: The Duplicate Student Borrower report is generated on the first Saturday of each month and is sent to schools' SAIG mailboxes (DARCxxOP) the following Monday. This report is available on the COD Web site. The Duplicate Student Borrower report lists the student borrowers for which the COD System has accepted multiple Direct Loan Subsidized and/or Unsubsidized Award records with the same or overlapping academic years. Schools can see other schools that have submitted a record for a borrower attending their school.

Inactive Loans Report: The Inactive Loan report is produced monthly, generated on the first Saturday of each month, and sent to schools' SAIG mailboxes (INACCDOP) the following Monday. This report is available on the COD Web site. The Inactive Loans report lists all Direct Loan awards that have been inactivated (adjusted to \$0) by the school for the reporting period.



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Schools can use this report during the closeout process to verify that their systems' records for inactive or cancelled loans match COD's records.

School Account Statement (SAS): The SAS report is generated on the first Saturday of each month and is sent to schools' SAIG mailboxes (Message Classes DSDDxxOP, DSDFxxOP, DSLDxxOP and DSLFxxOP) the following Monday. The SAS reports contains COD data on Direct Loan cash balances, cash details, booked loans, and booked or unbooked disbursement transactions. Schools may use the SAS report in conjunction with DL Tools software. Further information regarding DL Tools is available at <http://www.ifap.ed.gov/eannouncements/0708DLToolsR5.html>.

Note: Schools are able to choose various format options for the 30-Day Warning report, Pending Disbursement List, Funded Disbursement List, Duplicate Student Borrower report, SAS report, and Inactive Loans report by accessing the Report Selection Link on the COD Web site's School Summary Information screen. School user levels 3-5 have access to select format options via this link.

Prior to making any changes to your school's SAS options, always remember to select the appropriate award year from the Award Year dropdown menu on the Report Selection screen. This will ensure that any changes you make to your school's SAS options are applied to the correct award year.

Further details on customizing your SAS report are available in the 2004-2005 COD Technical Reference, Volume VIII, Section 8 and the 2005-2006 COD Technical Reference, Volume VI, Section 8, <https://www.fsadownload.ed.gov/docsStudentAidGateway.htm>.

SSN/Name/DOB Change Report: The SSN/Name/DOB Change Report is only produced when a change is made to a student's SSN, Name and DOB. This report is sent to schools' SAIG mailboxes (Message Class SNDCCDOP) and is available on the COD Web site in the Direct Loan Reports section under the school services tab. This report shows SSN, Name and DOB changes that are initiated by any school, and SSN changes that are initiated by the Common Services for Borrowers/Direct Loan Servicing system. Schools can also view changes made to a person by performing a person search on the COD Web site. Click on the "Events" tab located on the left side of the screen. This will allow users to view any changes made to the person record.

Note: the Duplicate Student Borrower, Inactive Loans and SSN-Name-Date of Birth Change reports are no longer award year specific. As a result, these reports are not available under the award year specific link (Duplicate Student Borrower 2003-2004, Inactive Loans 2003-2004, and SSN-Name-Date of Birth Change 2003-2004), but can be found under the corresponding non-award year specific link.



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In addition to the reports listed above, schools may also use the Compare Program in Direct Loan Tools. The program is helpful to schools when reconciling because it compares SAS data to a school's system data. See the FAQ entitled "What is Direct Loan (DL) Tools?" for more information.

Pell Grant Reports:

Verification Status Report: The Verification Status Report is available for the 2004-2005 Award Year and forward. It is generated monthly on the first Sunday of each month and sent to schools' SAIG mailboxes (Message Class PGVR05OP) the following Monday and Tuesday. In addition, this report is available on the COD Web site and schools can request this report via a Pell Data Request. The report provides a listing and a summary count of disbursed Pell awards for all students selected for verification by the Central Processing System (CPS) for whom the school submitted a verification status code of "W" or blank. The report listing contains new records and previously reported records with the new records listed first. The Verification Status Report is available to QA schools via a school-initiated data request.

Pell POP Report: The Pell POP Report is available for Award Year 2004-2005 and forward (Message Class PGPRxxOP). The report is sent weekly to schools' COD News Boxes and is available to schools via a Pell Data Request. The Pell POP Report lists students currently in POP and students no longer in POP for the current award year as well as all schools involved in each POP situation.

SSN/Name/Date of Birth Change Report: The SSN/Name/Date of Birth Change Report is automatically sent to schools' SAIG mailboxes (Message Class PGSNxxOP) on a daily basis, when a person identifier change is initiated. This report is also available via the COD Web site. The report lists SSN, Name, and Date of Birth changes on the COD System that are initiated by any school and is sent to all Reporting schools with a Pell award in COD for that student for any of three award years.

Pending Disbursement List: The Pending Disbursement List is generated each weekend and is sent to schools' SAIG mailboxes (Message Class PGPDxxOP) on the following Monday. This report is also available via the COD Web site. The report lists all anticipated disbursements and actual disbursements with a disbursement date between 8 and 30 days in the future on the COD System for a given school.

Funded Disbursement List (Pushed Cash/Just In Time (JIT) Schools Only): The Funded Disbursement List is automatically sent to JIT schools' SAIG mailboxes (Message Class PGFDxxOP) when actual disbursements are funded by COD. This report is also available on the COD Web site. The report displays all disbursements that have been funded on a particular date.



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For further information on these Pell reports, schools can also refer to Volume VIII, Section 8 of the 2004-2005 COD Technical Reference and Volume VI, Section 8 of the 2005-2006 COD Technical Reference.

Multiple Reporting Record (MRR): The MRR is produced and sent to schools' SAIG mailboxes when COD receives disbursement records from multiple schools for the same student whose enrollment dates are within 30 days of each other.

The Multiple Reporting Record (MRR) provides information to schools about a student's Pell Grant origination and disbursement status at other schools/campuses and the amount of the scheduled Pell Grant award disbursed. The MRR is a tool that identifies two primary types of multiple reporting conditions: concurrent enrollment and potential overaward situations.

Schools may request a MRR via the data request batch process (PGRQxxIN) or via the COD Web site Batch Search screen. The MRR is also available by request for origination purposes.

Pell Year-to-Date (YTD): The Year-to-Date (YTD) Record shows the number of recipients at the school; the number of award and disbursement records that were accepted, corrected, and rejected; and, for certain edit codes, the number of times a school received that specific edit code on a response document. The YTD Record can be used to replace a corrupt database or to reconcile records with accepted data on COD.

Schools may request a YTD via the data request batch process (PGRQxxIN) or via the COD Web site Batch Search screen. The data request is acknowledged to schools via their SAIG mailboxes (PGRAXxOP). The YTD is generated and sent to schools via their SAIG mailboxes (PGYRxxOP).

Pell Reconciliation: The Pell Reconciliation report is a one-record summary of all records processed by the COD System for a student. This report can be used to reconcile the total disbursement amount per student with COD. This file is provided only in the fixed-length record format and is detailed in its record layout found in Volume 8 of the 2004-2005 COD Technical Reference available at: <http://www.fsadownload.ed.gov/CODTechRef0405.htm/>.

Schools may request the Pell Reconciliation file via the data request batch process (PGRQxxIN) or via the COD Web site Batch Search screen. The data request is acknowledged to schools via their SAIG mailboxes (PGRAXxOP). The Pell Reconciliation file is generated and sent to schools via their SAIG mailboxes (PGRCxxOP).

Note: Message Class with "xx" indicates applicable Award Year.

Electronic Statement of Account (ESOA): The ESOA summarizes Pell Grant obligation (CFL) changes and GAPS drawdown activity. In addition, it lists the YTD Unduplicated Recipient



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Count, YTD Total Accepted and Posted Disbursements and YTD Total Administrative Cost Allowance. The ESOA is sent to schools' SAIG mailboxes (PGASxxOP) each time the school's CFL is adjusted and upon initial authorization in June prior to the start of an award year. Starting March 2005, an ESOA will also be sent to a school's SAIG mailbox when an Administrative Cost Allowance payment is generated for the school.

Schools may also request a ESOA via the data request batch process (PGRQxxIN) or via the COD Web site Batch Search screen. The data request is acknowledged to schools via their SAIG mailboxes (PGRAXxOP). The ESOA is generated and sent to schools via their SAIG mailboxes (PGASxxOP).

Note: Message Class with "xx" indicates applicable Award Year.

What if I need information that is not available on the reports listed above?

The COD School Relations Center has the ability to create customized reports (Ad hoc report) when the standard reports do not provide needed information. Schools should contact the COD School Relations Center for assistance.

What is Direct Loan (DL) Tools?

DL Tools is a stand-alone module of EDEExpress software designed to assist Direct Loan schools re-build lost or corrupted loan and/or disbursement data in an EDEExpress database, track cash transactions (drawdowns and returns of cash), compare the SAS report to loans and actual disbursements recorded in EDEExpress (or an external file), and compare the SAS report to the DL Tools Cash Database.

DL Tools can be downloaded at: <http://www.fsadownload.ed.gov/>. Refer to electronic announcement <http://www.ifap.ed.gov/eannouncements/0708DLToolsR5.html>, for more information on using DL Tools software.

Where do schools send refunds of cash for Title IV funds?

Funds should be returned using the Electronic Refund function in GAPS at: <http://e-grants.ed.gov/egHome.asp?APP=>. The Electronic Refund function can be accessed from the GAPS 'Main Menu'. For additional information, refer to the refund procedures in the "Frequently Asked Questions" on the GAPS web site.

The Department will continue to accept refund checks. Pell Grant funds for all award years should be returned to:

Department of Education
P.O. Box 952023
St. Louis, MO 63195



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Direct Loan funds should be returned to:
COD School Relations Center
P.O. Box 9001
Niagara Falls, NY 14302

For Direct Loan funds, please include a completed Direct Loan Refunds of Cash form with your check, and also note your school code and the award year on the check itself. Refer to DLB 04-06, <http://www.ifap.ed.gov/dlbulletins/DLB0406.html>, for more information and the Direct Loan refunds of Cash form.

What's new with the Potential Overaward (POP)?

The Potential Overaward (POP) is a Pell Grant program project to address the situation where a Pell Grant award has been disbursed by multiple schools, and causes the student to exceed 100% of his or her Scheduled Pell Grant award.

Beginning with the 2002-2003 Award Year, a change was implemented to improve the efficiency in which POP situations are resolved. This change was implemented in response to numerous schools requesting a better process to resolve POPs that were “blocking” the eligible school and student from receiving funds under the previous process. This change prevents the “blocking” problem by allowing the overaward to exist for 30 days while schools work together to resolve the issue.

When a POP situation occurs, COD will notify all schools involved via a Multiple Reporting Record (MRR). Schools must research the student's status, confirm eligibility and reduce disbursements that should not have been made.

If schools do not reconcile POP situations within 30 days, COD will generate a “Negative Disbursement” and reduce ALL disbursements to zero (\$0.00) at all involved schools. The eligible school may resubmit actual disbursement data to reinstate the student's award. If multiple schools resubmit disbursements, causing an overpaid status again, COD will send another MRR to all schools involved. To avoid this cyclic situation, schools should collaborate with the corresponding POP affected school(s) and correct the overpayment situation.

Information regarding the business rules pertaining to POP situations is available in the 2003-2004, 2004-2005, and 2005-2006 COD Technical References Volume II & III, section 1, <https://www.fsdownload.ed.gov/docsStudentAidGateway.htm>.

What can schools do to prevent a POP condition from occurring?

Schools should enroll in the NSLDS Transfer Student Monitoring Process. Once a school is enrolled, NSLDS alerts schools to any Pell Grant disbursements made on the student or other changes that could affect the student's eligibility for Title IV student aid. Information regarding



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the Transfer Student Monitoring process is available as a General Letter on IFAP at:
<http://www.ifap.ed.gov/dpcletters/GEN0109.html>.

Schools can also review the COD Web site's Person Pell Information screen to check the Pell Grant Eligibility Used for the student. In order to view this information, schools will need to perform a person search on the Person Search screen using the student's social security number and then click on the Pell link.

On the Multiple Reporting Record (MRR), the Record Type values PB (Blocked Institution), PU (Unblocked Institution), RC (Blocker and Concurrent Enrollment), and BC (Blocked and Concurrent Enrollment) refer to the RFMS terms "Blocked", "Unblocked", and "Blocker". Since schools are no longer "Blocked" and "Unblocked", clarify how these values are defined for award years 2002-2003 and forward.

For award years 2002-2003 and forward, all Record Type values are defined as follows:

- CE-The student is concurrently enrolled.
- PB-The student is in a POP condition. The school listed on the MRR was the school **not paid first** that disbursed funds to the student.
- PR-The student is in a POP condition. The school listed on the MRR was the **first** school that disbursed funds to the student.
- RC-The student is in a POP condition and is concurrently enrolled. The institution listed in the MRR was not the last institution to disburse funds to the student.
- PU-The student is no longer in a POP condition.
- BC-The student is in a POP condition and is concurrently enrolled. The school listed on the MRR was the school **not paid first** that disbursed funds to the student.
- RC-The student is in a POP condition and is concurrently enrolled. The school listed on the MRR was the **first** school that disbursed funds to the student.

What should a school do if all attempts to work with the corresponding POP school have failed?

COD understands that mediation between schools may be difficult at times. When mediation has failed and the same school(s) continues to submit disbursement records for the same student, schools may contact the COD School Relations Center. COD customer service representatives are available to assist in mediating and escalating POP issues to the Department's FSA Operations area for resolution.